Exhibit 5

UNEDITED, UNCERTIFIED, ROUGH DRAFT ONLY

Deposition of 7-21-2009. Direct by George.

VIDEOGRAPHER: Today is July 21st, 2009. This is the videotaped deposition of Craig Thompson taken in the case of SFA Systems, LLC versus Infor Global Solutions, Incorporated, et al., Civil Action No. 6:07 CV 067. The time is 10 o'clock a.m. We're on the record at Thomspon & Knight in Dallas, Texas. We're on the record.

CRAIG WARREN THOMPSON,

having been first duly sworn, testified as follows:

MR. GEORGE: I'm Bruce George of Blank Rome Philadelphia for Defendant, Infor Global Solutions, with me is Joel Dion, also with Blank Rome.

MR. PRIDHAM: David Pridham here on behalf of the Plaintiff.

THE WITNESS: I'm Craig Thompson.

EXAMINATION

BY MR. GEORGE:

Q. Hi, Dr. Thompson, thanks for coming today. Just to get started, when were you first retained in this matter?

A. The very end of April, I think, the 30th.

Q. Who contacted you?

change that a little bit, where -- change of topic a little bit, leave Spezialetti maybe alone for a little bit. Let's start, if you would, I guess, what I'd like to do is maybe go through the prior art portions of your report.

A. Okay.

Q. And just address or clarify your analysis for say the claim elements, primarily directed, you're using Claim 1 as say the representative claim for the independent claims, you would agree most of those steps are similar?

A. Somewhat related.

Q. So we'll be able to do that. Let's see, starting with --

A. You have the advantage of tabs.

Q. Yeah. No, I'll tell you. I'll tell you the page. Let's see. I'll try to walk you through it. Maybe we'll get through it quicker that way, too?

A. Okay.

Q. Okay. On page 56, just addressing the preamble. Do you dispute that fully describes the preamble of Claim 1, which is a computer implemented sales system used to facilitate the sales process, the system comprising?

MR. PRIDHAM: Object to form.

A. Phillipe is a -- the Phillipe patent describes the prodigy online system circa 1989 or '90, somewhere in that time frame, which is like -- could be thought of as an analog to the worldwide web. That is, there might be a client that sits on a user's machine and a server back at some central place, and as such, primarily Phillipe is directed at describing the reservation system or client interface, is what they call it. But I'll call it the client interface or the browser like interface. So I think Phillipe is primarily directed at describing how their servers and their clients communicate.

So I don't see that Phillipe is primarily targeted at -- it is certainly computer implemented system, but I don't see that it is primarily targeted at a sales system used to facilitate a sales process.

Q. Does Phillipe disclose any part of a sales process?

A. At a few points, maybe one or more points in Phillipe he mentioned that you might be able to do, and I can't remember his list, but banking is among them, and for instance, and so if one understands what the web is now and sort of considers -- oh, I think weather might be another one, but if you consider web pages nowadays and assume that they get used for any purpose

of for small information or banking or stocks or whatever, then by analogy you'd have to believe that the prodigy system could be used for system -- for uses like that. I don't think that the Phillipe patent goes into any detail on any of those. I think they call them partitioned applications.

Q. Uh-huh. Okay. Moving to Claim 1, element A. Is it correct that you dispute that Phillipe performs this claim element?

A. Let me review. I think it says I just said that in fact certainly the case that Phillipe describes an overarching system that consists of plurality of systems and that they configured in some way and they facilitate something and they might facilitate actions and so that part is certainly the case.

Now, as I said, it was analogous to a web browser, that is, it was like prodigy's the description of that prodigy online system. So I don't think that it was directed to performing these partitioned applications as during at least one phase of a sales process. I don't think it's directed in that way. That's not the emphasis. It's certainly possible that someone could use it to implement a step or a phase of a sales process.

Q. Okay. Moving to one B. An event manager

coupled to the subsystems, the event manager detecting one or more changes in state characteristic of an event occurring within the system.

A. And your question?

Q. And your analysis is on 62. You do agree that it performs -- that Phillipe performs this claim element?

A. Phillipe is clear that there is an event manager. They describe it in some detail here and there and give some examples. And so I don't dispute that they have an event manager that detects one or more changes in state characteristics of events that occur in the system. Most of their examples are directed to those traditional graphical user interface events, like scrolling down a page, which is a major portion of what the Phillipe browser like interface, when they describe it, they're describing blocks of data filling up parts of the page and browsing capability, and so on. So they are using that event manager for at least recognizing those graphical user commands, which were prior art, in my view. I don't think they're -- I don't know that they were claiming them. So, yes, I don't dispute that.

Q. Okay. Element C. Inferring occurrence of the event in a context in which the event occurred based at least in part on detected changes in state. Your

manager detects, infers and initiates. So the event manager is not different than -- or rather it's different in some sense, it is a structure that performs all three of these families of actions, which -- one of which is inferring. I didn't see if the Phillipe patent providing the inferring step, as we said, it does provide a detecting step, but not -- there's no real evidence of the inferring step. So I didn't see that once it detects something that it does anything more than to take a procedural sequence of steps as actions. I mean, that's what I would presume it -- I mean, in the absence of anymore description, it didn't look like it was checking the antecedents of what had just happened, the event that had just happened against a rule base and taking an action.

Q. You do use the term in this prior art, and maybe I can find a cite as we move forward, but let me ask now, you do often say that the prior art does not teach or does not disclose an inference mechanism.

A. Or perhaps --

MR. PRIDHAM: Object to form.

A. -- provide -- I was, as an expert, looking for an inference mechanism, a rules -- in a rule base, some reasoning component that might be using such things, some evidence that went beyond a conventional event

driven, that is, listening, followed by a direct handling that would be thought of as procedural collection of steps. Was looking for some indirection there that would add flexibility to the system, where the business rules or inferences or the knowledge would be that could provide that indirection or sharing or other. And I didn't really see any mechanism like that fully.

Q. Okay. So the term inference mechanism, I'm thinking when you use the term mechanism, some kind of component or structure. What would an inference mechanism be or could it be?

A. Among other things, it could be an inference engine with a rule base, or, alternatively, it could be entries into a semantic web knowledge base or and it could somehow indirectly call some learning mechanism or something beyond just calling a fixed procedural set of steps, so it could have been potentially more than -- well, more than what I viewed as they say how prior art would have done it, if that's all I was seeing in '525, I would have said, well, I think we already have one of those. But I didn't see an example of a distributed system. I didn't see any of the eight references an example of a directed system that when it recognized a situation that it detected a new -- that a context was

implemented sales system used to facilitate a sales process, the system comprising.

A. I did agree to that.

Q. Okay. You do have the caveat, for one narrow hard coded phase of the sales process.

A. I do.

Q. Okay. All right. Element A. The plurality of subsystems configured to facilitate one or more actions performed during at least one phase of the sales process.

A. I agree.

Q. You do agree that Long performs that element. Thank you.

A. Again, for that one -- or for a narrow phase of the sales process in that /REULGDZ way.

Check.

Q. Okay. Element B. An event manager coupled to the subsystems. The event manager detecting one or more changes in state characteristic of an event occurring within the system. You do agree that Long performs that claim element.

A. Yes. It was certainly an event manager. It does a very simple kind of event managing. It's implemented by polling e-mail, I think we talked about that many hours ago and -- but it does have event

manager, even though I believe they don't mention events, event managers or event management. Now that I think of it, that thing that does the polling, I would have to go back and look to see whether it's coupled to the subsystems, that is, as if a separate box, if you will, in this architecture diagram or whether it's more like integrated or just a pile of code that's kind of tied closely to the systems on the claim in the server site. I might have to review that aspect. But generally, there is something that conceptually would recognize these simple events, like poll for an e-mail message that says, this is a request for quote or this is an order.

Q. Okay. Thank you. Element C. Inferring occurrence of the event in the context in which the event occurred based at least in part on the detected changes in state. Okay. You do believe Long does not perform this claim element.

A. Yes. I again do not see any description in the Long patent of any inference or rule or expert system or knowledge base or something or learning.

Q. Okay.

A. I just see these hard coded events.

Q. In the middle of 108, you mention, the system does not provide a mechanism for inferring, context or

rules. I just want to clarify. Were you looking for a mechanism for context?

A. Actually, I suppose I could back off from the word context. It does have an extremely simple notion of event detection, and context is getting out that notion of, in this situation, do something. And there is a notion that's simple, very simple about context. It's basically, hold this e-mail and see if it says it's an order event or it's a request for quote event.

So, in that sense, it's a hard coded -- it's not a separable context mechanism, but it's kind of a hard coded one. So, whether I would call that a mechanism or pull it out, it's pretty darn hard coded into the system. There's no indirection for knowledge, no way to insert business rules there, that I see.

Q. Okay. And in this context -- that maybe wasn't a good word -- but you are referring, when we're speaking of here a mechanism for context, context as the Court's construed it, in that a context is information.

A. Uh-huh.

Q. Not like a contextual mechanism of some kind.

A. Right. I see it as the information often in rule systems, upon this condition in this context, could be another statement of when this information is present. So, in that sense, there might be a thing

looking to see if that context is there. Well, here, there are two hard coded if statements of the conventional variety that say, after we find out that there's a polling event and there's an e-mail here, see whether it's a request for quote. See if the subject line says request for quote. I mean, it's so hard coded that it's not a general capability that you could use to tie the system to other systems or anything like that. It's -- that's what I meant earlier on when I said it was a narrow and fixed system. It has the functionality, it has -- it doesn't really have an extensibility mechanism for adding new modules, integrating them in with rules, so I was looking for such a capability here and only finding something that looked very much like conventional technology in that regard. And I don't think that patent was aimed at and they didn't seem to be claiming that they had a new kind of notification or event or some other system. They were just more claiming that they had a system that could allow you -- people in the field to customize requests for complex stuff that they were going to order. So they were more about -- I mean, their emphasis on that patent was in a different place, so they were just describing how they did it and they were using conventional technology, in my view. Since it was

supposedly prior art, I was comparing it -- Cook's description of it and then the actual patent, I was comparing it to see whether it matched up with what I took to be the -- I'll say focus that we see in these independent claims of the '525 Patent as looking for those concepts. And so, I mean, essentially, the form of inference isn't really present there. We could quibble about the other things, about whether it detects, whether it really detects or whether it's just a procedural step. It doesn't have sort of a separable, extensible, reprogrammable detection mechanism anyway. I suppose I said more than you wanted to hear.

Q. Would it be -- could it use a rule to simply do a detection for a procedural step?

A. Could what do that? Could the Long patent?

Q. Could Long?

A. I don't see that Long has any rules that are implemented as rules where someone could add or even state a rule. There are -- you could say as a human that you can see that the system hard codes rules and, for instance, you could say that if someone requests a quote, then the system will respond with a quote. We humans would recognize that as a kind of a high level rule, but that's so built into the system that that is the only action that occurs, and there is no

extensible -- it's not like a statement of rule, it's more like -- I mean, if that were what we meant by rule here, almost everything in any program that we ever wrote could be thought of as, if I execute this step, then I'll execute the next one. If I execute this one, I'll execute the next one, and we would have billions of rules. And then we wouldn't really need to talk about rules, because they'd be everywhere.

Q. In your view, what are we referring to when we speak about rules here?

MR. PRIDHAM: Object to form.

A. In my view, the Court talks about logical rules and the patent talks about -- gives a few examples of if then kinds of rules, and it mentions inference, so it seems to allow for rules not only of the kind if antecedent then fact, also if antecedents then action, so I believe that these separate -- what we might call a rule base or collection of rules might well be a common way to implement the inferring mechanism. Maybe not the only way, but certainly if we never saw anything like that, we would be sort of saying, well, what did we gain in the '525 Patent from that? It was this separating out of this business logic that is now encoded in these separately specifiable rules that are fairly easy to change, as opposed to writing programs, which is -- uses

a programmer. And so often in the AI world, we think of declarative knowledge as easier to specify, and it doesn't -- it's not really tied to a particular way it's going to be used. We just state it, and then it's modularly there. And so often I would be looking for some kind of a mechanism for encoding relationships like facts or relationships like if this happens, then this is true or do this.

So if I don't see anything like that, which is what I was looking for, I didn't see it in Long, so essentially it's a sales automation step that helps a salesperson work with a client in the field who has a complex problem to specify. But it looked like it was primarily using, while it used multiple components, it was using conventional technology. And it wasn't so much that it was introducing a way of integrating systems, because there are only a fixed number of systems and they're so hard coded together that it does exactly what it does and it does no more, and there's nothing in the patent that talks about being able to add more functionality, whereas there's a presumption core in this patent, at least in this specification, that it's an integrated technique for hooking together modules in a sales automation world.

Q. Okay. Thank you. You did mention earlier in

of the word inference in context of the predecessor claim element, again, I'm looking for, in view of the '525 Patent, I'm looking for some mechanism capability portion of the system where I could discern that that is a coupled event manager subsystem that has these properties and I really didn't see evidence of that.

So it's not that I object to the initiating to facilitate a new action, because you can see that in some sense it does, the predecessor event causes another action. It's just that I think that it's hard wired. I don't see it as the result of rules or inference or what I take to be the inference portion of this.

Q. Okay. Thank you. Okay. Let's move on to Lockwood. Before we start, for each of these pieces of art, we're looking at claim one, we're talking about the preamble and then the elements.

A. Okay.

Q. Do you have a view of whether the preamble or the limitations included in the preamble should be required or are required?

MR. PRIDHAM: Object to form.

A. This is a broad question about all of these?

Q. Yeah. About the preamble, generally.

A. I don't know if that's a legal question, whether preamble's are treated distinctly from the --

I'll call it the rest of the element. So as I come into separately on the preamble, and I don't know whether that's something that the Court decides, whether it's known and it's always true or whether it's never true, I don't know. But I did comment on it in each case, so I have an opinion about each case, but just don't know legally the status of the preamble.

Q. Fair enough. So you commented based on what was there and whether it might be disclosed.

A. Right.

Q. Okay. So the preamble for Lockwood.

A. I guess I did say the Court has not construed this preamble, so I presume that the Court has or could have or might have come into or it must be relevant, so I suppose I knew that and I think the lawyers and I talked about including that phrase, so we included it or I included it, but again, my own -- even at this moment is what I said, I don't know the status of the importance of that preamble.

Q. Okay.

A. In each of them. Okay. So your question?

Q. So for the preamble for Claim 1, do you believe Lockwood discloses the preamble?

A. Let me just take a quick read, but -- largely. So, it is computer implemented, it's a sales system,

it's used to facilitate a sales process. And so in that I'd say largely, mostly sense, it is that. In the largest spirit of the patent overall, like the title says, sales automation, and to some extent, and interested in situations where the claims help automate the entire -- and I'll say larger sales process, I'm thinking that the patent in its more broad and normal sense could potentially be used to help in several phases and with salespeople involved. So the thing that Lockwood doesn't do, it's kind of a kiosk system where a user is a customer at a mall or an auto sales place or wherever, and they sit down, they interact with the system, sort of like we do on the web, only this is pre-web, and so the system when people thought about kiosks are sort of specialty systems were remotely talking to a special application. It's kind of like going to a place and shopping, you know, at the library or something, but you don't get to shop at home.

Anyway, because it's kiosk oriented, it's a narrower kind of sales automation, but it certainly automated sales. And so the answer is, to make our day shorter, it's a special case of what the more general case is about, I think, admits to or is in depth. But -- so it will be true of the Lockwood system.

Q. Okay. Element A. On page 149, you mention

that Lockwood arguably performs this element. Could you explain, I guess, how they arguably describe affects your answer?

A. Let me read this again. Plurality -- certainly has that. Facilitate one or more actions during at least one phase of the sales process. In their world, it was pretty much one phase as a sales process, which was endurance -- I mean, the application that they mostly talk about was -- I think it could have been others, but certainly was getting quotes for insurance and maybe possibly buying the insurance remotely. And I suppose it's kind of mean to say arguably. It executes this, and I was admitting that. It is, again, as -- I guess it's sort of looking forward to later on elements, but it's a hard coded system, again. It's a distributed system with a remote kiosk. It doesn't have salespeople, but it meets these claim elements.

Q. Okay. Thank you. For element B, on 150, you do state that Lockwood performs this claim element.

A. Yes. Let me remember -- maybe it won't matter. I think it's a distributed message passing system, so instead of using e-mail as the communication, I think it just uses a little higher level protocol that's more sort of not something humans usually use but more like subpoena row between calls the messages back and forth

Q. Okay. For element C, at the bottom of page 151, you state that Lockwood does not perform this claim element. You state just below that, Lockwood does not mention event trigger rule, in parens, for context.

How much of your opinion that Lockwood does not perform this claim element is based on the fact that the patent does not mention event trigger, rule, inference or context?

MR. PRIDHAM: Object to form.

A. One of the tests I did with each of the patents was simply to see what words they used and look for words that seemed to me to be indicators that some functionality was there. But another test I made was, I read the patents carefully and I looked for mechanisms, possibly described differently than these words. And so, I'm just reporting here that I didn't see evidence in the words that they used, and truly I didn't see evidence of any mechanism when I was reading the patent that would implement the inferring kind of layer that we've been talking about.

Q. And when you say "mechanism," are you referring to structure or a component?

A. I'll say a functionality. It could be a structure or a component or even a hard coded procedural logic. I'm looking for something that admits to an

extensibility mechanism that allows me to -- allows someone, like the user or an implementer of systems to add components and have communication beyond fixed exact lines of communication, between fixed compoments, and in Lockwood, there seemed to be only the kiosk and the back end, I forget what they called it, but back in the computer environment might be several kiosks, of course, but there was limited functionality that the kiosk did that would show you insurance quotes, let you specify what you wanted, get a quote, then possibly let you buy it, as I kind of recall.

And so that was a fixed family of functions, and again, I didn't see any inferring mechanism, functionality, layer, any part of the system, any of those kinds of things to latch onto and say, oh, there it is. That's the part of the system that does these things. That would be analogous for part of the system over here. In fact, the '525 that does that. I didn't find such a part.

Q. Using that analogy, what parts of the '525 do perform that functionality?

A. Well, for instance, in the '525, in just Claim 1, we've been talking quite a bit today about an event manager that among other things that's an inferring step in the '525 when we were reading the body of the patent.

for that customer that may be related to that purchase. Okay. So that's the -- so it is a computer implemented sales system using sales, facilitates the sales process, so the preamble is met.

Q. Okay. For element A, at the bottom of page 184, you do agree that Deaton performs Claim 1, element A.

A. I have my usual narrow phase of -- meaning that, again, it's brittle, like these older systems, it does exactly what it does but it's not naturally extensible to -- it's kind of like the things that they talk about at the beginning of this patent, '525 Patent, where they talk about predecessor systems that could do limited functions. This one, again, does two kinds of functions. One is recognizing that it's seen a customer, keeping track of them, into giving them some coupons. So, yeah, it meets the -- but it's limited. It has a plurality of systems. They do what the claim element says.

Q. Okay. For element B, at the top of page 186, you state that Deaton does not perform this claim element. And in the second paragraph, you mention that Deaton is not directly -- or not directed to sales force automation. Is that a strong basis for your opinion?

MR. PRIDHAM: Object to form.

current transactions.

A. Okay. Would have been helpful here looking now and in light of the late hour of the day if he had actually provided a reference to where that would have been because then I would go read that. Now, if there is an area of the patent where there is a list of rules that do that kind of thing, I would be interested in looking back at it.

It is certainly possible that there's an area of -- I'll call it program logic, but by that I mean built in, hard coded list of case statements that are in this program that do that. So, again, if that were the case, I would not identify that as a rule and inference, because I would say that that's where we would be reading in inference by just using that word in a human like way. And I would say if a system doesn't implement a way to do this based on these declarative statements, then I wouldn't accept it as inferring and rules and so on. So it would depend on -- now, I would go back and, you know, I'm interested, I'll be interested in going back to look at this to see whether there is anything there, although it might take me a long time, because he didn't give me reference. Would have been nice to have that. So I wouldn't accept it on face value just because he said it, because sometimes in

other places he said things like this that might have -- okay. I ran a piece of code that looked in the database and got for this customer that they're an infrequent shopper. That's a normal query in a database. I could use conventional queries and that might be a line of code. See if this is a traditional shopper because they don't show up very often by some threshold. You could write a little line of code that would do that. It could be a rule or part of a rule, the ability to add more such rules or the ability to change the rule in some way or the ability to reason with the rule and have then statements and some flexibility. But if it's just a line of code that then does the next line of code and says, well, I found that it's a threshold infrequent shopper, therefore, make a better deal for them or worse deal. You know, some people like their frequent customers and they'll give them a better deal, some might want to entice the infrequent ones. But if that's built into the procedural logic, then I wouldn't -- I can see how someone would describe it to their mother as one of the rules in their system, but I wouldn't accept it in the sense of the '525 Patent as a -- it wouldn't be a flexibility mechanism that allows me to add or change my business rule, so I would want to see that. And since he didn't reference it, I'd have to search for

any event manager. And so Dr. Cook identified the main processor in the computer as an event manager. A little bit of a stretch if that's really what -- I'd have to go back and read it carefully, but, you know, it's kind of like saying, if I'm right and that's what he did, that would be a little like saying, every program has data and it all has events and it's all -- I mean, I'm looking for the sort of technical attributes of a thing, like an event manager.

Q. But you are aware that the Court has construed event manager to be hardware and/or software?

A. Yes. Right. That is what the Court says. And so that is correct, event manager is hardware and software. Interestingly, as soon as we say that, whenever the event manager appears, for instance, on Claim 1, then we start saying things about it. So, while it's hardware and software, as long as it meets these other things, like it's coupled, that is, it's a separable system, talks to other systems or it has these detecting, inferring and automatically initiating, then these are -- so any -- nearly anything is an event manager unless it does this, then it's the kind we care about. Okay.

Q. Okay. Let's move on to element C on 274. You state that Cragun does not perform this claim element.

middle. Associate, tell me this.

That there would be a possibility that you could build expert systems that are recommending things. In fact, we're going to see that in Cook, I think, later.

Q. Okay. Let's see. Element D on 277.

A. Okay.

Q. Just want to confirm that you state Cragun does not perform this claim element. And your basis is because as we've discussed, there's -- the action is not based on the inferred context, since we don't have the inferring.

A. I didn't say those words exactly, but that is, again, consistent with what I've been looking for all day long in these patents, which I think is in the '525, isn't in these so far, and so I'm not saying it.

Q. Okay. All right. Let's move on to Gorog.

A. Yeah. This should be Gorog arrest /KHEPB par could or whatever it is.

Q. Yeah. Claim one's preamble is on 330.

A. Give me a second on Gorog once I find it. 330? I want to just remember. I think I have a good memory of this, but it's -- I'm still finding it. Okay. 326. Give me one second. Oh, yeah, this is the OCT, Order Computer Terminals.

Q. Okay.
A. Okay. I have a high level memory of this.
Q. Okay.
A. So, preamble, computer implementing, sales system uses facilities in its process.
Q. Yes. On 330, just wanted to confirm --
A. I do confirm.
Q. Okay. Claim 1, element A. Just want to confirm that you state that Gorog does perform this element. That's at the bottom of 331.
A. Yes.
Q. Okay. Element B, 333.
A. A merciful great answer, yes. Okay. Where are we now, page three --
Q. On 333.
A. 333. Okay.
Q. Claim 1, element B. Your opinion is that Gorog does not perform this claim element. Okay. Down towards the bottom of the page, last full paragraph, the change of state, the OCT terminal seems to accept is just the user entering the purchase. This does not seem to be equivalent to the '525 event manager that is capable of integrating a collection of sales processes and that uses inference and rules.
A. So here I'm not -- truly not really objecting

to the possibility that Gorog could have mechanisms that do the sort of historically common event management because it is a distributed system, and my strong preference would be to believe that distributed systems almost always contain the simple event manager idea because they're reacting to things from the outside. So I think I'm mainly saying that I didn't see in Gorog a good enough description that would allow me to recognize this claim element.

Q. Okay. Is that the basis for your use of the term seems to?

A. Yes. I mean, this is --

Q. So, in fact, it could possibly be --

A. It could possibly be. I just couldn't discern it from the description that was in the Gorog.

Q. Okay. Element C on page 335. You state that Gorog does not perform this claim element. This is the full and firing stat.

A. And I suppose to make life simple here I -- where in contrast I might have given an inch and so on, I really want to see the evidence of, you know, show me some bacon here, and I'm not seeing the bacon. I didn't see the bacon in the other one, and I could have accepted that maybe there was something there because events in the traditional variety have existed for a

Q. Okay.
A. So it wasn't required.
Q. We are referring to the inferring step here.
A. Right. But I wasn't finding the inferring mechanism even whether it was a single system, a single function box or whatever.
Q. Okay.
A. Single module of the sales system.
Q. Would you agree that Claim 1 does not require sharing rules across system boundaries?
A. Yes. Well, let me see. Claim 1 requires a plurality of subsystems, and it requires a separable event manager, and so to the extent that the event manager is a -- it is a separable itself thing, that's coupled, then, to those systems, then similar in this picture, while the event manager module, it could talk to just one system, but information interchange is happening between the event manager and that at least one system. So the there will at least be two systems, one of them being the event, which is -- it's a separable thing that's coupled to a subsystem.
Q. Okay.
A. You see what I'm saying?
Q. Yes, I do. Thank you. But does Claim 1 require that rules are shared or passed across subsystem

boundaries?

A. No, I don't think so.

Q. Okay. Does Claim 1 require that the system be a flexible scheme for sharing information?

A. Claim one, whether it requires it or not, it's used to facilitate a sales process that has this plurality. And so while I would say it doesn't explicitly require it in the language of the claim, if we go back into the body of the patent, even to the title of the patent and also to the rationale for the patent, we would be understanding that integration is central and these are top level claims. So my training tells me that we are adding flexibility to the system at the level of extracting out business rules that are then easily changeable or shareable information, we're putting those facts and rules in a place where we could operate on them more easily. And that would be a better integration mechanism. So, no, I'm reading that in based on my understanding of -- my understanding, my history, the patent specification motivation, and then I'm looking at what these claims require. And so, no, I'm reading, to the extent that I'm reading it and you're asking about it, Claim 1 doesn't explicitly talk about why you do it. It says, if you do these things, then you're obeying Claim 1.

Q. Would your answer be similar if I were to mention the terms we've used today, modular and expandable? Like so that the system being modular or the system being expandable, similarly, they're not required in Claim 1?

A. Right. Claim 1 doesn't actually require them. And actually modular and expandable can be -- can build modular, expandable systems without having any inference capability. So, I suppose different ways to answer your question, but I think the way you asked it, this claim doesn't talk about modularity and expanse -- integration or expansion joints or any of those notions explicitly, but when I read it, knowing what I know and also knowing the motivation, then I believe that it will result in a system that does have those properties.

Q. Okay. Element D.

A. Or it's intended to. Element B?

Q. D. I'm sorry. D. On 336.

A. Okay.

Q. You state, Gorog does not perform this claim element. And, again, it appears your reliance here is based on no inferred context.

A. Right.

Q. Okay. Maybe due to the time, we'll skip Stone. Let me just look at a couple more general questions.